

WILLIAM L. VEEN, NO. 43150, *in propria persona*
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

KEVIN R. McLEAN,
Plaintiff,
v.

CASE NO. 07-5594 JSW
**ANSWER TO AMENDED
COMPLAINT**

WORLD SAVINGS FSB; INTEGRITY
INVESTMENT GROUP, LLC; GOLDEN
WEST SAVINGS ASSOCIATION SERVICE
CO.; SUSAN FEDERIGHI; BILL FORD;
JEFFERY FORD; CALIFORNIA FRANCHISE
TAX BOARD; and WILLIAM L. VEEN,
DefendantS.

Defendant William L. Veen answers plaintiff Kevin R. McLean's Amended Complaint as follows:

THE PARTIES

1. Answering Paragraph 1 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

2. Answering Paragraph 2 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

3. Answering Paragraph 3 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

4. Answering Paragraph 4 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

5. Answering Paragraph 5 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

6. Answering Paragraph 6 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

7. Answering Paragraph 7 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

8. Answering Paragraph 8 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

9. Answering Paragraph 9 of the Complaint, defendant denies that he is a resident of the City and County of San Francisco, California. Defendant admits that he claims an interest in the property that is the subject of this lawsuit by reason of a judgment lien recorded against said property. As to the remaining allegations of Paragraph 9 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis denies each and every remaining allegation.

JURISDICTION AND VENUE

10. Answering Paragraph 10 of the Complaint, defendant does not dispute that this Court has subject-matter jurisdiction.

11. Answering Paragraph 11 of the Complaint, defendant does not dispute that venue is

proper in this Court.

FACTUAL BACKGROUND

12. Answering Paragraph 12 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

13. Answering Paragraph 13 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

14. Answering Paragraph 14 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

15. Answering Paragraph 15 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

16. Answering Paragraph 16 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

17. Answering Paragraph 16 of the Complaint, defendant William L. Veen admits that he was never given notice of the October 3, 2007 trustee sale. As to the remaining allegations of Paragraph 16 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis denies each and every remaining allegation.

18. Answering Paragraph 18 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

FIRST CAUSE OF ACTION

19. Answering Paragraph 19 of the Complaint, defendant incorporates by reference paragraphs 1-18 of this Answer as if stated fully herein.

20. Answering Paragraph 20 of the Complaint, defendant William L. Veen admits that he

1 was never given notice of the October 3, 2007 trustee sale. As to the remaining allegations of
 2 Paragraph 20 of the Complaint, defendant is without sufficient knowledge or information to form a
 3 belief as to the truth of the allegations, and on that basis denies each and every remaining allegation.

4 21. Answering Paragraph 21 of the Complaint, defendant William L. Veen admits that he
 5 was never given notice of the October 3, 2007 trustee sale. As to the remaining allegations of
 6 Paragraph 21 of the Complaint, defendant is without sufficient knowledge or information to form a
 7 belief as to the truth of the allegations, and on that basis denies each and every remaining allegation.

8 22. Answering Paragraph 22 of the Complaint, defendant is without sufficient knowledge
 9 or information to form a belief as to the truth of the allegations contained in said paragraph, and on
 10 that basis denies each and every allegation contained therein.

11 23. Answering Paragraph 23 of the Complaint, defendant is without sufficient knowledge
 12 or information to form a belief as to the truth of the allegations contained in said paragraph, and on
 13 that basis denies each and every allegation contained therein.

14 **SECOND CAUSE OF ACTION**

15 24. Answering Paragraph 24 of the Complaint, defendant incorporates by reference
 16 paragraphs 1-22 [*vis*] of this Answer as if stated fully herein.

17 25. Answering Paragraph 25 of the Complaint, defendant is without sufficient knowledge
 18 or information to form a belief as to the truth of the allegations contained in said paragraph, and on
 19 that basis denies each and every allegation contained therein.

20 26. Answering Paragraph 26 of the Complaint, defendant admits that he claims an
 21 interest in the property that is the subject of this lawsuit by reason of a judgment lien recorded
 22 against said property. As to the remaining allegations of Paragraph 26 of the Complaint, defendant is
 23 without sufficient knowledge or information to form a belief as to the truth of the allegations, and
 24 on that basis denies each and every remaining allegation.

25 27. Answering Paragraph 27 of the Complaint, defendant is without sufficient knowledge
 26 or information to form a belief as to the truth of the allegations contained in said paragraph, and on
 27 that basis denies each and every allegation contained therein.

28 **THIRD CAUSE OF ACTION**

28. Answering Paragraph 28 of the Complaint, defendant incorporates by reference paragraphs 1-26 [*vis*] of this Answer as if stated fully herein.

29. Answering Paragraph 29 of the Complaint, defendant admits that he claims an interest in the property that is the subject of this lawsuit by reason of a judgment lien recorded against said property. As to the remaining allegations of Paragraph 29 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis denies each and every remaining allegation.

30. Answering Paragraph 30 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

31. Answering Paragraph 31 of the Complaint, defendant William L. Veen admits that he was never given notice of the October 3, 2007 trustee sale. As to the remaining allegations of Paragraph 31 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis denies each and every remaining allegation.

FOURTH CAUSE OF ACTION

32. Answering Paragraph 32 of the Complaint, defendant incorporates by reference paragraphs 1-31 of this Answer as if stated fully herein.

33. Answering Paragraph 33 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

34. Answering Paragraph 34 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in said paragraph, and on that basis denies each and every allegation contained therein.

35. Answering Paragraph 35 of the Complaint, defendant William L. Veen admits that he was never given notice of the October 3, 2007 trustee sale. As to the remaining allegations of Paragraph 35 of the Complaint, defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations, and on that basis denies each and every remaining allegation.

36. Answering Paragraph 36 of the Complaint, defendant is without sufficient knowledge

1 or information to form a belief as to the truth of the allegations contained in said paragraph, and on
2 that basis denies each and every allegation contained therein.

3 WHEREFORE, defendant prays as follows:

4 1. That plaintiff take nothing by reason of his Complaint, that judgment be rendered in favor
5 of defendant;

6 2. That defendant be awarded his costs of suit incurred in defense of this action; and

7 3. For such other relief as the Court deems proper.
8

9 DATED: January __, 2008

THE VEEN FIRM, P.C.

11 By: /s/
12 William L. Veen
13 *In propria persona*

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PROOF OF SERVICE

I am employed in the City and County of San Francisco, State of California. I am over 18 years of age and not a party to this action. My business address is The Veen Firm, P.C., 711 Van Ness Avenue, Suite 220, San Francisco, California 94102.

Electronic Case Filing:

Kevin R. McLean, Esq. Law Office of Belli & McLean 473 Jackson Street, 2 nd Floor San Francisco, CA 94111 Tel: (415) 981-0100 Fax: (415) 981-2050	In Pro Per
Rosalie Euna Kim, Esq. Reed Smith, LLP Two Embarcadero Center, Suite 2000 San Francisco, CA 94111 Tel: (415) 659-5949	Attorney for Defendant WORLD SAVINGS FSB; GOLDEN WEST SAVINGS ASSOCIATION SERVICE COMPANY

I declare under penalty of perjury under the law of the State of California that the foregoing is true and correct.

DATED: January 18, 2008

/s/
Margo Banowicz